U.S. EPA REGION 7 FACILITY RESPONSE PLAN (FRP) - REVIEW FORM

I. FACILITY INFORMATION

FRP NUMBER: FRP07A0023	**FACILITY NAME:** Magellan Pipeline Company - St. Joseph Terminal	
FACILITY OWNER: Magellan Pipeline Company, L.LC		
FACILITY OPERATOR (if different from owner):		
MAILING ADDRESS: 963 Vernon Road		
CITY: Wathena	**STATE:** KS	**ZIP:** 66090
TELEPHONE: 785-989-3448	**FAX:**	
LATITUDE: 39 ° 45 ′ 05 ″ N	**LONGITUDE:** -94 ° 55 ′ 41 ″ W	
OTHER DESCRIPTION OR DIRECTIONS: located in Wathena, Kansas, west of St. Joseph, MO		

SITE LOCATION MAP ATTACHED: ☐ YES ☐ NO

II. FACILITY OVERVIEW

DATE OF INITIAL FACILITY OPERATION: 1969

TOTAL STORAGE CAPACITY (bbls./gals): 3,619,243 gallons **# OF TANKS:** 13

WORST CASE DISCHARGE (bbls./gals): 55,280 bbls

CAPACITY OF LARGEST ABOVE GROUND STORAGE TANK (bbls./gals): 2,321,890 gallons

NAME OF AFFECTED WATERWAY(S)/PROTECTED WATERWAY(S)/ENVIRONMENTALLY SENSITIVE AREA(S): surface drainage to the Missouri River

Distance from Facility: <1/2 mile to the Missouri River

RESPONSE CONTRACTOR(S): Haz-Mat Response, Inc., Acme Products Co.

YES	NO	
☒	☐	**STANDARD RESPONSE PLAN COVER SHEET SUBMITTED WITH PLAN.**
☒	☐	**EMERGENCY RESPONSE ACTION PLAN SUBMITTED WITH PLAN OR AS SEPARATE PART OF PLAN.**
☐	☒	**THE FACILITY RESPONSE PLAN FOLLOWS 40 CFR 112 APPENDIX F FORMAT.**

III. FRP APPLICABILITY [40 CFR 112.20 (f)(1)]

☐ The facility transfers oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 gallons.

-OR-

☒ The facility's total oil storage is greater than or equal to 1 million gallons, and one of the following is true:

☐ The facility does not have secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground oil storage tank within each storage area plus sufficient freeboard to allow for precipitation.

☒ The facility is located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments.

☒ The facility is located at a distance such that a discharge from the facility would shut down a public drinking water intake.

☐ The facility has had a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years.

☐ **Substantial Harm Facility** ☒ **Significant and Substantial Harm Facility**

REVIEWED BY:	Paul Doherty	**DATE:**	10/10/2010
FRP STATUS:		**DATE:**	
APPROVED BY:		**DATE:**	

NOTE: The following checklist items correspond to the final regulations as outlined in 40 CFR 112.20, Appendix F. For all checklist items, indicate FRP adequacy as follows: adequately addressed (YES), deficient or not addressed (NO), or not applicable (N/A).

IV. FACILITY RESPONSE PLAN REVIEW

FRP NUMBER: FRP07A0023 **FACILITY NAME:** Magellan Pipeline Company - St. Joe Terminal	YES	NO	N/A	Page	Comments
1.0 Emergency Response Action Plan (ERAP). *Several sections of the response plan should be collocated for easy access by response personnel during an actual emergency or oil spill [40CFR 112.20 (h)(1)].*	**X Adequately Addressed** **□ Major Deficiencies** **□ Minor Deficiencies** **□ Not Addressed**				
Located in Front of Binder or Separate Binder	X				separate binder
Does the Emergency Response Action Plan Contain the Following:					
a. Qualified Individual Information	X				Section 2.2
b. Emergency Notification Phone List	X				Section 3.2
c. Spill Response Notification Form	X				Figure 3-1
d. Response Equipment List and Location	X				Figure 4-2
e. Response Equipment Testing and Deployment	X				Figure 4-3 and 4-4
f. Facility Response Team	X				Figure 3.1-3
g. Evacuation Plan	X				Section 2.3 and Figure 5-2
h. Immediate Actions In Case of Spill	X				Section 2.2
i. Facility Diagram	X				Figures 5-1 and 5-2
2.0 Facility Information. *The facility information form is designed to provide an overview of the site and a description of past activities at the facility [40 CFR 112.20 (h)(2)].*	**☒ Adequately Addressed** **□ Major Deficiencies** **□ Minor Deficiencies** **□ Not Addressed**				
Overview of the Site	X				Figure 1-3
Description of Past Activities at the Facility	X				Figure 1-3
Facility Name and Location	X				Figure 1-3
Latitude and Longitude (Main Entrance)	X				Figure 1-3
Wellhead Protection Area (Safe Drinking Water Act of 1986)	X				Figure 1-3
Owner/Operator	X				Figure 1-3
Qualified Individual (i.e. person or persons with full authority to implement the facility response plan)	X				Section 4.5
Date of Oil Storage Start-up: 1969	X				Figure 1-3
Description of Current Operation (including SIC code)	X				Figure 1-3
Dates and Type of Substantial Expansion	X				Figure 1-3
Date of Last FRP Update: plan dated January 2005	X				May 2008

IV. FACILITY RESPONSE PLAN REVIEW

FRP NUMBER: FRP07A0023 **FACILITY NAME:** Magellan Pipeline Company - St. Joe Terminal	YES	NO	N/A	Page	Comments
3.0 Emergency Response Information. *Information provided in this section shall describe what will be needed in an actual emergency involving the discharge of oil or a combination of hazardous substances and oil discharge [40 CFR 112.20 (h)(3)].*					☐ **Adequately Addressed** ☐ **Major Deficiencies** **X Minor Deficiencies** ☐ **Not Addressed**
3.1 Notification.					
Emergency Notification Phone List. *Identifies and prioritizes the names and phone numbers of the organizations and personnel that need to be notified immediately in the event of an emergency.*	X				Figure 3.1-3
National Response Center	X				Figure 3.1-3
Qualified Individual	X				Figure 3.1-3
Company or Facility Response Team	X				Figure 3.1-3
Federal On-Scene Coordinator (FOSC) and/or Regional Response Center (RRC)	X				Figure 3.1-3
Local response team	X				Figure 3.1-3
Fire Marshall	X				Figure 3.1-3
State Emergency Response Commission (SERC)	X				Figure 3.1-3
State Police	X				Figure 3.1-3
Local Emergency Planning Committee (LEPC)	X				Figure 3.1-3
Local water supply system	X				Figure 3.1-3
Weather report	X				Figure 3.1-3
Local television/radio stations for evacuation notification	X				Figure 3.1-3
Hospitals	X				Figure 3.1-3
Other Appropriate Phone Numbers for the Facility	X				Figure 3.1-3
Phone Numbers Verified	X				Figure 3.1-3; "as needed"?
Contact List Accessible to all Facility Employees		X			not addressed
Spill Response Notification Form. *A checklist of information that shall be provided to the National Response Center (NRC) & other response personnel.*	X				Figure 3.1-2
Reporter's name	X				Figure 3.1-2
Company information	X				Figure 3.1-2
Date and time of incident	X				Figure 3.1-2
Incident description	X				Figure 3.1-2

IV. FACILITY RESPONSE PLAN REVIEW					
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Material released and estimated volume	X				Figure 3.1-2
Response action	X				Figure 3.1-2
Impacted areas	X				Figure 3.1-2
Evacuations, injuries, and estimated damage assessment	X				Figure 3.1-2
3.2 Facility's Emergency Response Equipment. *Personnel and equipment lists not required if facility has contracted with a classified Oil Spill Response Organization (OSRO) contractor.*					
Location of Response Equipment	X				warehouse building
Location of Response Equipment is shown on Facility Diagram	X				Figure 1
Description of Emergency Equipment	X				OSRO-owned equipment
Skimmers/Pumps	X				OSRO-owned equipment
Hard Boom		X			150' of hard boom identified; no equivalent containment strategy proposed
Vacuum Trucks	X				OSRO-owned equipment
Sorbents	X				varies
Heavy Equipment	X				OSRO-owned equipment
Boats/Motors	X				OSRO-owned equipment
Dispersants/Application Equipment	X				OSRO-owned equipment
Fire Fighting and Personal Protective Equipment	X				OSRO-owned equipment
Communication Equipment	X				Section 7.1.6
Other Removal Equipment					OSRO-owned equipment
Amount of Oil that Emergency Equipment can handle	X				Figure 7.3-3
Any Limitation of Equipment	X				Figure 7.3-3
3.3 Response Equipment Tests & Deployment Drills.					
Last inspection or equipment test date. *Inspection/test procedures and schedules required for all facility equipment listed.*	X				Figures A.1-2; A.1-3 and A.1-4
Inspection frequency	X				Figures A.1-2; A.1-3 and A.1-4
Inspection log book is maintained	X				Figures A.1-2; A.1-3 and A.1-4
Last deployment drill date	X				Figures A.1-2; A.1-3 and A.1-4

IV. FACILITY RESPONSE PLAN REVIEW

FRP NUMBER: FRP07A0023 **FACILITY NAME:** Magellan Pipeline Company - St. Joe Terminal	YES	NO	N/A	Page	Comments
Deployment frequency	X				Figures A.1-2; A.1-3 and A.1-4
OSRO Certification (if applicable)	X				Section B.1.1
3.4 Facility Response Personnel. *List of all personnel, including those employed by the facility and those under contract to the facility for response activities, the amount of time needed for personnel to respond, their responsibility in the case of an emergency, and their level of response training.*					
Emergency Response Personnel	X				Figure 3.1-3
Emergency Response Contractors (both primary and secondary)	X				Figure 3.1-3 and Appendix B
Evidence of Response Capability	X				Appendix B
Facility Response Team	X				Figure 3.1-3
3.5 Evacuation Plan.					
Facility-wide evacuation plan is provided	X				Section 2.3
Evacuation Plan Diagram is provided	X				Figure 2
Location of stored materials is indicated	X				Figures 1
Hazards imposed by the spilled material are indicated	X				Section 2.1.6
Spill flow direction(s) are indicated	X				Figure C-6 and C-7
Prevailing wind speed and direction are indicated	X				Section 2.3
Evacuation routes from the facility are indicated	X				Figure 2
Alternative routes of evacuation are indicated	X				Figure 2
Arrival route of response personnel and equipment are indicated	X				Section 2.3
Selection of a mitigation command center is indicated	X				Figure 2
Location of alarm/notification systems are indicated	X				Section 2.3
Transportation route of injured personnel to nearest hospital is provided	X				Section 2.3
Location of shelter at facility as an evacuation alternative	X				Section 2.3
Check-in area for evacuation validation (roll-call) is indicated	X				Figure 2
Reference to existing community evacuation plans	X				Section 2.3
3.6 Responsibilities of Qualified Individuals at the Facility in the Event of an Emergency.					
Description of duties	X				Section 4.5

IV. FACILITY RESPONSE PLAN REVIEW					
FRP NUMBER: FRP07A0023 **FACILITY NAME:** Magellan Pipeline Company - St. Joe Terminal	YES	NO	N/A	Page	Comments
Duties are consistent with requirements	X				Section 2.3
Authority to access company funding	X				Section 2.3
Note: *The information provided in the emergency response section will aid in the assessment of the facility's ability to respond to a worst case discharge and will identify additional assistance that may be needed.*					
4.0 Hazard Evaluation. *This section requires the facility owner or operator to examine the facility's operations closely and to predict where discharge could occur [40CFR 112.20 (h)(4)].*	☒ **Adequately Addressed** ☐ **Major Deficiencies**			☐ **Minor Deficiencies** ☐ **Not Addressed**	
4.1 Hazard Identification. *Tank and Surface Impoundment (SI) forms, or their equivalent.*					
Schematic drawing of facility (identical to SPCC plan schematic)	X				Figure 1
• Labeled Schematic Drawing	X				Figure 1
• Above Ground Tanks Identified Separately	X				Figure 1
• Below Ground Tanks Identified Separately			X		
• Surface Impoundments Identified Separately			X		
Tank Form Requirements:					
• Tank or SI number	X				Figure C-4
• Substance stored	X				Figure C-4
• Quantity stored (bbls./gals)	X				Figure C-4
• Tank type and year Installed	X				Figure C-4
• Maximum Capacity (gallons)	X				Figure C-4
• Failure/Cause	X				Figure C-4
• Labeled schematic of tanks included in plan	X				Figure 1
• Is secondary containment identified for each tank?	X				Figure C-4
Surface Impoundment Form Requirements:					
• Surface Impoundment Number			X		
• Substance stored			X		
• Quantity stored (gallons)			X		
• Surface area/year (ft^2)			X		
• Maximum Capacity (gallons)			X		
• Failure/Cause			X		

IV. FACILITY RESPONSE PLAN REVIEW

FRP NUMBER: FRP07A0023 FACILITY NAME: Magellan Pipeline Company - St. Joe Terminal	YES	NO	N/A	Page	Comments
• Labeled schematic of surface impoundments included in plan			X		
Description of facility operations					
☒ Loading/unloading of transportation vehicles ☐ Pipelines plus Loading Racks Volumes: ☐ Over-water Volumes:	X				Figure 1-3 57,330, 000 gas and 25,200,000 gal distillates annualy
• Day-to-day operations that may present a risk of oil discharge	X				Figure C-4
• Normal daily throughput for the facility	X				Figure 1-3 160,000 gal/day gas and 69,000 gal/day distillates
• Secondary containment volume associated with each tank and/or transfer points	X				Figure C-4
4.2 **Vulnerability Analysis.** *Shall address the potential effects (i.e. to human health, property, or the environment) of an oil spill:*					
Planning Distance Calculations per 40 CFR 112 Appendix C	X				Figure D.4-2
Are the calculations correct (see attached Planning Distance Calculations Worksheet)?		X			Figure D.4-2, no calculations for drainage ditch prior to Missouri
Vulnerability analysis addresses the potential effects of an oil spill to the following targets:					
• Water intakes	X				Sections 6.6. and 6.7;
• Schools	X				Sections 6.6. and 6.7; none identified
• Medical facilities	X				Sections 6.6. and 6.7; none identified
• Residential areas	X				Sections 6.6. and 6.7; none identified
• Businesses	X				Sections 6.6. and 6.7;
• Wetlands or other sensitive environments	X				Sections 6.6. and 6.7
• Fish and wildlife	X				Sections 6.6. and 6.7
• Lakes and streams	X				Sections 6.6. and 6.7
• Endangered flora and fauna	X				Sections 6.6. and 6.7
• Recreational areas	X				Sections 6.6. and 6.7
• Transportation routes	X				Sections 6.6. and 6.7
• Utilities	X				Sections 6.6. and 6.7
• Other areas of economic importance	X				Sections 6.6. and 6.7

IV. FACILITY RESPONSE PLAN REVIEW

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4.3 Analysis of the Potential for an Oil Spill. *Each owner or operator shall analyze the probability of a spill occurring at the facility.*					
Potential for a spill to occur at the facility	X				Appendix D.2.1
Incorporates Factors:					
• Spill history	X				Figure C-13
• Horizontal range of a potential spill	X				Figure D.4-1
• Vulnerability to natural disaster	X				Figure D.2-1
• Age and condition of tanks and equipment	X				Figure C-4
• Other: _____					
4.4 Facility Reportable Oil Spill History. *Brief description of the facility's reportable oil spill history for the entire life of the facility to the extent that such information is reasonably identifiable.*					
Date of discharge(s)	X				Figure C-13
List of discharge(s) causes	X				Figure C-13
Material(s) discharged	X				Figure C-13
Amount discharged in gallons	X				Figure C-13
Amount of discharge that reached navigable waters	X				Figure C-13
Effectiveness and capacity of secondary containment			X		no spills to navigable waters reported
Clean-up action(s) taken			X		
Steps taken to reduce possibility of recurrence			X		
Total storage capacity of the tank(s) or impoundment(s) from which material is discharged			X		
Effectiveness of monitoring equipment			X		
Description of how each spill was detected			X		
5.0 Discharge Scenarios. *The owner or operator is required to provide a description of the facility's worst case discharge, as well as a small and medium spill, as appropriate [40 CFR 112.20 (h)(5)].*	☐ **Adequately Addressed** ☒ **Major Deficiencies**		☐ **Minor Deficiencies** ☐ **Not Addressed**		
5.1 Small and Medium Volume Discharges.					
Small Volume Discharges: A discharge equal to or less than 2,100 gallons [see 40 CFR 112.20 (h)(5)(ii)]. USCG average most probable discharge is the lesser of 50 barrels (2,100 gallons) or 1 percent of the WCD [see 33 CFR 154 Appendix C]. If the facility is a complex, the greater of the two should be used as the small volume discharge.					
• Small volume discharge calculation for a facility Small volume discharge in plan: 2,100 gallons (bbls/gals)	X				Section D.5

IV. FACILITY RESPONSE PLAN REVIEW

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Medium Volume Discharge: Medium volume discharge is greater than 2,100 gallons but less than or equal to 36,000 gallons or 10 percent of the capacity of the largest tank at the facility, whichever is less, provided that this amount is less than the WCD amount [see 40 CFR 112.20 (h)(5)(iii)]. USCG maximum most probable discharge is the lesser of 1,200 barrels (50,400 gallons) or 10 percent of the WCD [see 33 CFR 154 Appendix C]. If the facility is a complex the greater of the two should be used as the medium volume discharge.					
• Medium volume discharge calculation for a facility Medium volume discharge in plan: 2,100 to 36,000 gallons (bbls/gals)	X				Figure D.5
Small and Medium Volume Discharge Analysis					
• Correct average and maximum most probable discharge for "complexes"			X		not applicable
• 1,000 feet of boom (1 hour deployment time)		X			160' on site; 1,000' not addressed;
• Correct amount of boom for "complexes"			X		not applicable
• Oil recovery devices equal to small and medium discharge (2 hour recovery time)	X				Section 7.1.1
• Oil storage capacity for recovered material	X				Section 7.1.1
• Scenarios take into account all applicable facility operations including:					
- Loading and unloading of surface transportation	X				Section D-5
- Facility maintenance	X				Section D-5
- Facility piping	X				Section D-5
- Pumping station and sumps	X				Section D-5
- Oil storage tanks	X				Section D-5
- Vehicle refueling	X				Section D-5
- Age and condition of facility and components	X				Section D-5
- Other: _____					
5.2 Worst Case Discharge (WCD). WCD calculations should follow the guidelines outlined in 40 CFR 112 Appendix D. Complexes that are regulated by EPA and the USCG must also consider planning for the WCD at the transportation-related portion of the facility [see 33 CFR 154.1029]. Owners or operators of complex facilities that are regulated by EPA and USCG must compare both calculations of WCD derived by EPA and the USCG and plan for whichever volume is greater.					
Description of the WCD scenario provided WCD volume in plan: 54,283 bbls (bbls/gals)	X				Section D.7; 54,283 bbls
Correct WCD calculations	X				Section D.7
Correct WCD for "complexes"			X		not applicable
Sufficient response resources for WCD	X				Section D.7; Appendix B

IV. FACILITY RESPONSE PLAN REVIEW					
FRP NUMBER: FRP07A0023 **FACILITY NAME:** Magellan Pipeline Company - St. Joe Terminal	YES	NO	N/A	Page	Comments
Sources and quantity of equipment for response to WCD	X				Section D.7; Appendix B
Correct Response Planning Volumes	X				Section D.7; Appendix B
• Worst Case Discharge Planning Volume:	X				Section D.7; Appendix B
• On Water Planning(s):	X				Section D.7; Appendix B
• Shoreline Cleanup Planning Volume(s):	X				Section D.7; Appendix B
Are planning volumes > contracting caps?	X				Section D.7; Appendix B
• If yes, are sources of equipment identified to reach the planning volume?	X				Section D.7; Appendix B
• Are locations and quantities of equipment considered and arrangements made to obtain additional equipment included?	X				Section D.7; Appendix B
Oil storage capacity for recovered material	X				Section D.7; Appendix B
6.0 Discharge Detection Systems. *The facility owner or operator should provide a detailed description of the procedures and equipment used to detect discharges [40 CFR 112.20 (h)(6)].*	**X Adequately Addressed** □ **Major Deficiencies**			□ **Minor Deficiencies** □ **Not Addressed**	
6.1 Discharge Detection by Personnel.					
Detection procedures	X				Section D.3; Figure D.3-1
Description of facility inspections	X				Section D.3; Figure D.3-1: Figure C-10
Initial response actions	X				Section D.3; Figure 2-1
6.2 Automated Discharge Detection.					
Equipment description	X				Section D.3; Figure D.3-1
Alarm verification procedures	X				Section D.3; Figure D.3-1
Initial response actions	X				Section D.3; Figure 2-1
System inspection frequency	X				Section D.3; Figure D.3-1
7.0 Plan Implementation. *Owners or operators must explain in detail how to implement the facility's emergency response plan [40 CFR 112.20 (h)(7)].*	□ **Adequately Addressed** □ **Major Deficiencies**			**X Minor Deficiencies** □ **Not Addressed**	
7.1 Response Resources.					
Demonstration of accessibility of proper response personnel and equipment for small, medium and worst case discharges.	X				Appendix B
Emergency plans for spill response	X				Section 2
Additional training	X				Section A.2

IV. FACILITY RESPONSE PLAN REVIEW

P NUMBER: FRP07A0023 **FACILITY NAME:** Magellan Pipeline Company - St. Joe Terminal	YES	NO	N/A	Page	Comments
Additional contracted help	X				Appendix B
Access to additional equipment/experts	X				Appendix B
Ability to implement plan including training and practice drills	X				Appendix A
Immediate actions form for small, medium, and worst-case spills	X				Figure 2-1
7.2 Disposal Plans.					
Disposal plan provided	X				Section 5.5; Section 7.3; Figure 7.3-2
Disposal plan addresses federal, state, and local permit requirements as appropriate.	X				Section 5.5; Section 7.3; Figure 7.3-2
7.3 Containment and Drainage Planning.					
Containment and drainage plan available	X				Appendix C
Incorporates Factors:					
• Available containment volume	X				Appendix C
• Drainage routes from oil storage and transfer areas	X				Appendix C
• Construction materials used in drainage troughs		X			not addressed
• Type and number of valves and separators	X				Figure 1
• Sump pump capacities		X			not addressed
• Containment capacity of weirs and booms		X			not addressed
• Other cleanup materials	X				Appendix B
8.0 Self-Inspection, Drills/Exercises, and Response Training. *The owner or operator must develop programs for facility response training and for drills/exercises according to the requirements of [40 CFR 112.20 (h)(8)].*	**X Adequately Addressed** □ **Major Deficiencies**				□ **Minor Deficiencies** □ **Not Addressed**
8.1 Facility Self-Inspection.					
Records maintained for five years	X				Figure C-10; records maintained for 3 years
Inspection checklist	X				Figure C-10 and C-11
Inspection frequency	X				Figure C-10 and C-11
Tank Inspection.					
Check tank for corrosion, leaks, and integrity	X				Figure C-10 and C-11
Check foundation for corrosion, leaks, and integrity	X				Figure C-10 and C-11

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Check piping for corrosion, leaks, and integrity	X				Figure C-10 and C-11
8.1.2 Response Equipment Inspection.					
Inventory (item and quantity)	X				Section 7.1; Figure D.3-1
Storage location(s)	X				Figure D.3-1
Accessibility (time to access and respond to spill)	X				Figure D.3-1
Operational status/condition of equipment	X				Section 7.1; Figure D.3-1
Actual use/testing of equipment (last test date and frequency of testing)	X				Section 7.1.2; Figure D.3-1
Shelf life of equipment (present age, expected replacement date)	X				Figure D.3-1; blank form only
8.1.3 Secondary Containment Inspection.					
Dike or berm system (precipitation, valve condition, permeability, debris, and erosion)	X				Figure C-10
Secondary containment (precipitation, valve condition, permeability, debris, and product)	X				Figure C-10
Retention and drainage ponds (available capacity, debris, erosion, product, and stressed vegetation)	X				Figure C-10
8.2 Facility Drills/Exercises.					
Facility drills/exercise description	X				Figures A.1-1 and A.1-2
Equipment deployment exercises	X				Figures A.1-1 and A.1-2
Unannounced exercises	X				Figures A.1-1 and A.1-2
Area Exercises	X				Figures A.1-1 and A.1-2
Qualified Individual Notification Drills	X				Figures A.1-1 and A.1-2
Qualified Individual Notification Drill Log	X				Figures A.1-1 and A.1-2
Spill Management Team Table Top Exercises	X				Figures A.1-1 and A.1-2
Spill Management Team Table Top Drill Log	X				Figures A.1-1 and A.1-2
8.3 Response Training.					
Description of response training program	X				Section A.2 and Figure A.2-2
Personnel Training Logs	X				Section A.2 and Figure A.2-2
Discharge Prevention Meeting Log	X				Section A.2 and Figure A.2-2
9.0 Diagrams *[40 CFR 112.20 (h)(9)].*	**X Adequately Addressed** □ **Major Deficiencies**				□ **Minor Deficiencies** □ **Not Addressed**

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FRP NUMBER: FRP07A0023 **FACILITY NAME:** Magellan Pipeline Company - St. Joe Terminal	YES	NO	N/A	Page	Comments
Site diagram, including:	X				Figure 1; Figure C-6 and C-7
• Entire facility to scale	X				Figure 1; Figure C-6 and C-7
• Above and below ground bulk storage tanks	X				Figure 1; Figure C-6 and C-7
• Contents and capacities of bulk storage tanks	X				Figure 1; Figure C-4
• Contents and capacities of drum storage areas	X				Figure 1; Figure C-4
• Contents and capacities of surface impoundments			X		NA
• Process buildings	X				Figure 1; Figure C-6 and C-7
• Transfer areas	X				Figure 1; Figure C-6 and C-7
• Secondary containment systems	X				Figure 1; Figure C-6 and C-7
• Structures where hazardous materials are used and capacity	X				Figure 1; Figure C-6 and C-7
• Location of communication and emergency response equipment	X				Figure 1; Figure C-6 and C-7
• Location of electrical equipment which contains oil	X				Figure 1; Figure C-6 and C-7
• If a "complex" facility, interface between EPA and other regulating agencies			X		not applicable
Site Drainage Diagram, including:					
• Major sanitary and storm sewers, manholes and drains	X				Figure 1; Figure C-6 and C-7
• Weirs and shut-off valves	X				Figure 1; Figure C-6 and C-7
• Surface water receiving streams	X				Figure 1; Figure C-6 and C-7
• Fire fighting water sources	X				Figure 1; Figure C-6 and C-7
• Other utilities	X				Figure 1; Figure C-6 and C-7
• Response personnel ingress and egress	X				Figure 1; Figure C-6 and C-7
• Equipment transportation routes	X				Figure 1; Figure C-6 and C-7
• Direction of spill flow from release points	X				Figure 1; Figure C-4 and C-6
Site Evacuation Diagram, including:					
• Site plan diagram with evacuation routes	X				Figure 2; Figure C-7
• Location of evacuation regrouping areas	X				Figure 2; Figure C-7

IV. FACILITY RESPONSE PLAN REVIEW					
FRP NUMBER: FRP07A0023 **FACILITY NAME:** Magellan Pipeline Company - St. Joe Terminal	YES	NO	N/A	Page	Comments
10.0 Site Security. *Facilities are required to maintain a certain level of security, as appropriate [40 CFR 112.20 (h)(10)].*	**X Adequately Addressed** **□ Major Deficiencies**				**□ Minor Deficiencies** **□ Not Addressed**
Emergency cut-off locations	X				Figure C-3
Enclosure (fencing, etc.)	X				Figure C-3
Guards and their duties, day and night	X				Figure C-3
Lighting	X				Figure C-3
Valve and pump locks	X				Figure C-3
Pipeline connection caps	X				Figure C-3
11.0 Response Plan Cover Sheet *[40 CFR 112.20 (h)(11)].*	**X Adequately Addressed** **□ Major Deficiencies**				**□ Minor Deficiencies** **□ Not Addressed**
Page One:					
• Owner/operator of facility	X				Figure E-5
• Facility name	X				Figure E-5
• Facility address	X				Figure E-5
• Facility phone number	X				Figure E-5
• Latitude and longitude	X				Figure E-5
• Dun and Bradstreet number	X				Figure E-5
• Standard Industrial Classification (SIC) Code	X				Figure E-5
• Largest oil tank storage capacity	X				Figure E-5
• Maximum oil storage capacity	X				Figure E-5
• Number of storage oil tanks	X				Figure E-5
• Worst case discharge amount	X				Figure E-5
• Facility distance to navigable waters	X				Figure E-5
Page Two:					
• Applicability of substantial harm criteria	X				Figure E-5
Page Three:					
• Certification	X				Figure E-5
12.0 Additional Requirement for Plans not in EPA Format.	**☒ Adequately Addressed** **□ Major Deficiencies**				**□ Minor Deficiencies** **□ Not Addressed**
Does plan have stand-alone Emergency Response Action Plan at front of plan or in separate binder (regardless of format)?	X				Separate binder

IV. FACILITY RESPONSE PLAN REVIEW

NUMBER: FRP07A0023

FACILITY NAME: Magellan Pipeline Company - St. Joe Terminal	YES	NO	N/A	Page	Comments
Does the plan contain a proper cross reference to the EPA format as outlined in 40 CFR 112 Appendix F?	X				Appendix E

OTHER COMMENTS:

A review of the FRP concurs with the Facility Self-Certification that the Kansas City Terminal is a "Significant and Substantial Harm" facility. The Plan contains deficiencies in the following areas: Emergency Response and Facility Response Personnel; Response Equipment - location, response time and capabilities, hard boom capabilities, Calculations, Planning Distance Calculations. The facility should be notified of the review finding and asked to address the noted deficiencies.

PLANNING DISTANCE CALCULATIONS WORKSHEET

APPENDIX C TO 40 CFR 112

The facility must evaluate whether the facility is located at a distance such that a discharge from the facility could cause injury to the environments OR a public drinking water intake.

A regulated facility may meet the substantial harm criteria without having to perform a planning distance calculation. The planning distance calculation is not necessary for facilities that have inadequate secondary containment or that have experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons (238 barrels) within the past 5 years.

If more than one type of navigable water condition applies to a facility, then the facility is required to perform a planning distance calculation for each navigable water type to determine the greatest single distance that oil may be transported.

I. MOVING NAVIGABLE WATERS CALCULATION

Missouri River

A. Planning Distance = V x T x C (miles)

V = $1.5/n \times r^{2/3} \times s^{1/2}$ (ft/sec) Chezy-Manning's Equation

where

n = Manning's Roughness Coefficient (Table 1 of 40 CFR 112, Appendix C) = 0.04

r = Hydraulic radius, feet (average mid-channel depth x 0.667) = 10.005 feet*

s = Average slope of moving waterway (USGS topo maps) = 3.977273e-04

V = **3.47** ft/s

T = Time interval, hours (Table 3 of 40 CFR 112, Appendix C) = 27 ho

C = Constant conversion factor (0.68 sec•mile/hr•ft)

Planning Distance = **63.8** miles

* estimated river depth

WORST CASE DISCHARGE WORKSHEET

APPENDIX D TO 40 CFR 112
PART A: ONSHORE STORAGE FACILITIES

I. SINGLE-TANK FACILITIES

☒ Not Applicable

A. If secondary containment is adequate, then WCD = 80% of tank's capacity.

WCD(gals) = _____

B. If secondary containment is not adequate, then WCD = tank's capacity

WCD(gals) = _____

II. MULTIPLE-TANK FACILITIES

☐ Not Applicable

Do ALL ASTs lack adequate secondary containment?

☐ YES → Go to A.

☒ NO → Go to B.

A. If all ASTs lack adequate secondary containment, than WCD = total capacity of all ASTs.

WCD (gal) = 0

B. 1. Calculate the total aboveground oil storage capacity without secondary containment. This value is X. If all ASTs have adequate secondary containment, then X =0

X(gals) = 0

2. Calculate the capacity of the largest single AST within adequate secondary containment or the combined capacity of permanently manifolded ASTs, whichever is greater. This value is Y.

Y (gals) = 2,321,890

3. WCD = X + Y

WCD (gals) = **2,321,890**

III Worst Case Discharge for this Facility

WCD (gals) = **2,321,890**

WCD (barrels) = **55,283**

Note: Section III, Worst Case Discharge for this Facility, is automatically carried down to the planning discharge worksheet below.

WORKSHEET TO PLAN VOLUME OF RESPONSE RESOURCES FOR WORST CASE DISCHARGE

APPENDIX E TO 40 CFR 112

PART I. Background Information		
Step A. Calculate Worst Case Discharge in barrels (Appendix D)		**55,283**
		(A)
Step B. Oil Group (Table 3 and section 1.2 of 40 CFR 112, Appendix E)		
Step C. Operating Area (choose one)	☐ Near shore/Inland, Great Lakes	☒ Rivers and Canals
Step D. Percentages of Oil (Table 2 of 40 CFR, Appendix E)		
	Percent Lost to Natural Dissipation (D1)	80
	Percent Recovered Floating Oil (D2)	10
	Percent Oil Onshore (D3)	10
Step E1. On-Water Oil Recovery (Step (D2) * Step (A)/100) in barrels		**5,528**
Step E2. Shoreline Recovery (Step (D3) * Step (A)/100) in barrels		**5,528**
Step F. Emulsification Factor (Table 3 of 40 CFR 112, Appendix E)		1.0
Step G. On-Water Oil Recovery Resource Mobilization Factor (Table 4 of 40 CFR 112, Appendix E)		
Tier 1 (G1)	Tier 2 (G2)	Tier 3 (G3)
0.30	0.40	0.60
PART II. On-Water Oil Recovery Capacity (barrels/day)		
Tier 1 (E1 * F * G1) in barrels/day	Tier 2 (E1 * F * G2) in barrels/day	Tier 3 (E1 * F * G3) in barrels/day
1,658	**2,211**	**3,317**
PART III. Shoreline Cleanup Volume (barrels)		**5,528**
PART IV. On-Water Response Capacity by Operating Area (Table 5 of 40 CFR 112, Appendix E)		
Tier 1 (J1)	Tier 2 (J2)	Tier 3 (J3)
1,875	3,750	7,500
PART V. On-Water Amount Needed to be Identified, but not Contracted for in Advance (barrels/day)		
Tier 1 (Part II Tier 1 - J1)	Tier 2 (Part II Tier 2 - J2)	Tier 3 (Part II Tier 3 - J3)
(217)	**(1,539)**	**(4,183)**